To: jkenning@mt.gov[jkenning@mt.gov]; Eric Urban[eurban@mt.gov]
Cc: rdaveney@mt.gov[rdaveney@mt.gov]; Mike Suplee[msuplee@mt.gov];

jblend@mt.gov[jblend@mt.gov] **From:** Laidlaw, Tina

Sent: Mon 3/14/2016 11:14:29 PM Subject: WQBEL analysis document

DRAFT - Montana Nutrient WQBELs Analysis (09-09-15).docx

One more email to follow.

From: Laidlaw, Tina

Sent: Monday, March 14, 2016 5:12 PM

To: jkenning@mt.gov; Eric Urban <eurban@mt.gov>

Cc: rdaveney@mt.gov; Mike Suplee <msuplee@mt.gov>; jblend@mt.gov

Subject: FW: RP Analysis Files

Dividing this first email into 2 smaller emails. Hoping it makes it through your system.

From: Laidlaw, Tina

Sent: Monday, March 14, 2016 4:41 PM

To: 'Kenning, Jon' < <u>JKenning@mt.gov</u>>; Eric Urban < <u>eurban@mt.gov</u>>

Cc: Kusnierz, Lisa <kusnierz.lisa@epa.gov>; Perkins, Erin <Perkins.Erin@epa.gov>; Spence,

Sandra < Spence Sandra@epa.gov >; 'Blend, Jeff' < iblend@mt.gov >; 'rdevaney@mt.gov'

<rdevaney@mt.gov>; Mike Suplee <msuplee@mt.gov>

Subject: RP Analysis Files

Dear Jon and Eric,

As part of our approval action, we evaluated the assumption that facilities eligible to receive the general variance would need to meet the nutrient limits at the end-of-pipe. In Fall 2015, EPA tasked Abt (EPA's contractor) with conducting a more detailed review of all permitted dischargers that may be eligible to receive the nutrient general variance.

The attached documents summarize the subset of the 7 facilities that do not appear to meet the

assumptions of the general variance. This first email includes the Excel files with the data and calculations used in the reasonable potential analysis. The second email includes the word documents which present the economic analysis, following EPA's 1995 economic guidance and MDEQ's modified approach, completed for each of the seven facilities.

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Could you and your staff please review the attached draft documents to see if they are accurate and reflect the most up-to-date information? Feel free to call with any questions or concerns. Thanks!

Tina

Tina Laidlaw

U.S. EPA, Montana Office 10 West 15th St., Suite 3200

Helena, MT 59626 phone: (406) 457-5016